



Record of Deviation/ Request for Modification

to the

Libby Sampling and Quality Assurance Project Plan

SDMS Document ID



2009422

Instructions to Requester: Fax to contacts at bottom of form for review and approval.

File approved copy with Data Manager and fax copy to SRC.

Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
 Phase I (approved 4/00) Phase II (approved 2/01)
 Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dec Warren Title: CSS Task Leader
 Company: CDM Date: 6/29/02

Description of Deviation:

Structure sketches will only include approximate dimensions of the attic.

Field Logbook and page number deviation is documented on: 100057 page 108

Reason for Deviation:

The information required from the sketch is used to determine approximate volumes of vermiculite insulation; so only dimensions of the attics are needed

Potential Implications of this Deviation:

Loss of information regarding room dimension details.

Duration of Deviation (circle one):

Temporary Date(s): _____
 Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

① Page 4-6 Structure sketch. The sketch will not include all floors will only include approximate dimensions of the attics. ② see attached copy of logbook page.

Technical Review: [Signature]
 (Volpe Project Manager or designate) does not apply to CSS

Date: 7/2/02

Quality Assurance Review and Approval: [Signature]
 (Quality Assurance Coordinator or designate)

Date: 7/19/02

Approved By: [Signature]
 (USEPA RPM, OSC, or SSC)

Title: RPM Date: 7/2/02

Location Libby, MT Date 6/29/02
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

Vermiculite observed on property.

1110 - E-mail Jim Christensen regarding property at 11340 Riverside Drive. Try to provide information for letter requested by agent.

1150 - E-mail Jeff Montera to add Lincoln County Animal Shelter to priority sampling list.

1433 - Soils team #3 begins sampling on California.

1445 - Prepare Modification Form #000038:

A sketch of the structure is only to be completed if vermiculite insulation is found in the home.

The sketch will be used by removal/remedial contractors to determine approx. volume of vermiculite, so this step was determined not to be needed for homes not containing vermiculite insulation. Also the detail required on the sketch was reduced to just require only an estimated dimensions of the attic. Changes to

SAP: Page 4-6 Structure Sketch: Sketch will no longer include all floors. Sketch will approximate dimensions of the attic.

Page 7 of Completion of Property Information Field Form Guidance. There will no longer be

Location Libby, MT Date 6/29/02
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

one sheet completed per floor.

1502 - Prepare Modification Form #000039:
Rinse preparation method changed to EPA 100.2.

Changes to SAP: Page 6-1 section 6.1 Analytical Methods. Rinse preparation method changed to EPA Method 100.2 the analytical method will remain the same. Change was made so EMSL mobile Laboratory could perform the analysis.

1513 - Prepare Modification Form #000040:
Rinse samples are collected using locally available deionized or distilled water.

Changes to SAP: page 5-5 Section 5.4.2 2nd paragraph, 2nd to last sentence "... locally available deionized or distilled water will be used to collect the rinse sample."

1540 - Prepare Modification Form #000041:
The same BD#s will be used for apartment buildings or buildings with multiple businesses see page 71.

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Record of Deviation/ Request for Modification

to the
Libby Sampling and Quality Assurance Project Plan

**Instructions to Requester: Fax to contacts at bottom of form for review and approval.
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Project QAPP (circle one): PE Study Part a (approved 3/02) (pending) (approved 3/02)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approved 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren

Title: CSS Task Leader

Company: CDM

Date: 6/28/02
29 JUN 02

Description of Deviation:

Change Ainsate preparation method to EPA Method 100.2

Field Logbook and page number deviation is documented on: Logbook 100057 pg 109

Reason for Deviation:

Method for preparation changed because contracted laboratory could not prepare the samples by the method provided in the SAP.

Potential Implications of this Deviation:

Inconsistency between sample preparation of water samples collected between different SAPs. Issue discussed with Mary Goldade and deemed to be a minimal concern.

Duration of Deviation (circle one):

Temporary

Date(s):

Resident address(es):

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook page

Technical Review:

(Volpe Project Manager or designate) does not apply to CSS

Date:

7/2/02

Quality Assurance Review and Approval:

(Quality Assurance Coordinator or designate)

Date:

7/9/02

Approved By:

(USEPA RPM, OSC, or SSC)

Title:

Date:

7/2/02

Location Libby, MT Date 6/29/02
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

Vermiculite observed on property.

1110 - E-mail Jim Christensen regarding property at 113 W Riverside Drive. Try to provide information for letter requested by agent.

1150 - E-mail Jeff Montera to add Lincoln County Animal Shelter to priority sampling list.

1433 - Soils team #3 begins sampling on California.

1445 - Prepare Modification Form #000038:

A sketch of the structure is only to be completed if vermiculite insulation is found in the home.

The sketch will be used by removal/remedial contractors to determine approx. volume of

vermiculite, so this step was determined not to be needed for homes not containing vermiculite

insulation. Also the detail required on the sketch was reduced to just require only an

estimated dimensions of the attic. Changes to SAP: Page 4-6 Structure Sketch: Sketch will

no longer include all floors. Sketch will approximate dimensions of the attic.

Page 7 of Completion of Property Information Field Form Guidance. There will no longer be

Location Libby, MT Date 6/29/02 109
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

one sheet completed per floor.

1502 - Prepare Modification Form #000039:

Rinsate preparation method changed to EPA 100.2.

Changes to SAP: Page 6-1 section 6.1 Analytical Methods. Rinsate preparation

method changed to EPA Method 100.2 the analytical method will remain the

same. Change was made so EMSL mobile Laboratory could perform the analysis.

1513 - Prepare Modification Form #000040:

Rinsate samples are collected using locally available Deionized or distilled water.

Changes to SAP: page 5-5 Section 5.4.2 2nd paragraph, 2nd to last sentence

"... locally available deionized or distilled water will be used to collect the

rinsate sample."

1540 - Prepare Modification Form #000041:

The same BD#s will be used for apartment buildings or buildings with multiple businesses See page 71.

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Libby Sampling and Quality Assurance Project Plan**Instructions to Requester: Fax to contacts at bottom of form for review and approval.
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Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 6/29/02

Description of Deviation:
Locally available deionized or distilled water will be used to
collect rinseate samples.

Field Logbook and page number(s) documented in: 100057 pg 69.

Reason for Deviation:
ASTM Type II water was deemed unnecessary as the contaminate
of concern is Asbestos

Potential Implications of this Deviation:

None

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of
SQAPP when applicable):

See attached copy of logbook pages.

Technical Review: [Signature]
(Volpe Project Manager or designate) does not apply to CSS

Date: 7/2/02

Quality Assurance Review and Approval: [Signature]
(Quality Assurance Coordinator or designate)

Date: 7/9/02

Approved By: [Signature]
(USEPA RPM, OSC, or SSC)

Title: RPMDate: 7/2/02

Location Libby, MT Date 6/29/02
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

Vermiculite observed on property.

1110- E-mail Jim Christensen regarding property at 11340 Riverside Drive, Try to provide information for letter requested by agent.

1150- E-mail Jeff Montano to add Lincoln County Animal Shelter to priority sampling list.

1433- Soils team #3 begins sampling on California.

1445- Prepare Modification Form #000038:

A sketch of the structure is only to be completed if vermiculite insulation is found in the home.

The sketch will be used by removal/remedial contractor to determine approx. volume of vermiculite, so this step was determined not to be needed for homes not containing vermiculite insulation. Also the detail required on the sketch was reduced to just require only an estimated dimensions of the attic. Changes to

SAP: Page 4-6 Structure Sketch: Sketch will no longer include all floors. Sketch will approximate dimensions of the attic.

Page 7 of Completion of Property Information Field Form Guidance. There will no longer be

Location Libby, MT Date 6/29/02
Project / Client Libby Asbestos Site
Volpe Center EPA Region 8

one sheet completed per floor.

1502- Prepare Modification Form #000039:

Rinsate preparation method changed to EPA 100.2.

Changes to SAP: Page 6-1 section 6.1 Analytical Methods. Rinsate preparation method changed to EPA Method 100.2 the analytical method will remain the same. Change was made so EMSL mobile Laboratory could perform the analysis.

1513- Prepare Modification Form #000040:

Rinsate samples are collected using locally available Deionized or distilled water.

Changes to SAP: page 5-5 Section 5.4.2 2nd paragraph, 2nd to last sentence "... locally available deionized or distilled water will be used to collect the rinsate sample."

1540 - Prepare Modification Form #000041:

The same BD#s will be used for apartment buildings or buildings with multiple businesses. See page 71.

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Location Libby MT Date 6/19/02

Project / Client Libby Asbestos Site

Volpe Center EPA Region 8

Nevada, Minnesota, and Dakota.

Soil Team #3: B. Hunt and B. Hiltz

Logbook # 100074 working on Louisiana Ave

Soil Team #4 - Priority Property Team:

B. Ayles, P. Opem, R. Eustice Logbook #

100073 working on priority properties

and HWY 2.

PPE - attic inspection = C, verbal interview = D,

soil sampling = ~~BD~~ ⁶⁻¹⁹⁻⁰² ~~BD~~

All activities will be conducted in accordance

with the Final SAP for the RI/CS Libby Asbestos

Site 0014, April 2002

0800 Attend morning meeting. Topic

- Use same BD# for apartments at the

same address, but place apartment #

in the structure description field. Requires

completing MOD form.

0915 Receive call from David Romano (osc)

Concerning property at 86 Patiga Drive.

Mr. Romano requests dust sampling be

conducted in the ^{DB 6-19-02} ~~attic~~ basement bedroom

and laundry room.

0920 Receive call from EPA Info Center

D. W. Ayles



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Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren Title: CSS Task Leader
Company: CDM Date: 6/29/02

Description of Deviation:

More detail on the collection of BD#. The same BD# will be used for apartments or business at the same address, but the apartment # or suite # will be placed in the structure description field. Field Logbook and page number deviation is documented on: 100057 pg 71

Reason for Deviation:

For database tracking purposes so the same address will not have multiple GPS coordinates for multiple BD#s that are the same building.

Potential Implications of this Deviation:

Improved tracking of BD#s and address in the Libby Database.

Duration of Deviation (circle one):

Temporary Date(s): _____
Resident address(es): _____

Permanent (complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

Insert paragraph into Record GPS Locations Section on page 4-8.

Technical Review: [Signature]
(Volpe Project Manager or designate) does not apply to CSS

Date: 7/2/02

Quality Assurance Review and Approval: [Signature]
(Quality Assurance Coordinator or designate)

Date: 7/9/02

Approved By: [Signature]
(USEPA RPM, OSC, or SSC)

Title: SSC

Date: 7/2/02



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Project QAPP (circle one): PE Study Part a (approved 6/00), b (approval pending), c (approval pending)
Phase I (approved 4/00) Phase II (approved 2/01)
Removal Action (approved 7/00) CSS (approval 5/02)

Scenario No. (circle one): 1 2 3 4 NA

Requester: Dee Warren

Title: CSS Task leader

Company: CDM

Date: 6/29/02

Description of Deviation:

See page 110 of Logbook 100057. Modification
to IFF form

Field Logbook and page number deviation is documented on: 100057 page 110

Reason for Deviation:

To improve consistency between form completion among
multiple persons.

Potential Implications of this Deviation:

Improved consistency for the completion of IFFs

Duration of Deviation (circle one):

Temporary

Date(s): _____

Resident address(es): _____

Permanent

(complete Proposed Modification Section)

Proposed Modification to SQAPP (attach additional sheets if necessary; state section and page numbers of SQAPP when applicable):

See attached copy of logbook pages. These changes will
modify the IFF completion SOP.

Technical Review:

(Volpe Project Manager or designate) does not apply to CSS

Date:

7/2/02

Quality Assurance Review and Approval:

(Quality Assurance Coordinator or designate)

Date:

7/9/02

Approved By:

(USEPA RRM, OSC, or SSC)

Title:

RRM

Date:

7/2/02

BD# _____

LIBBY ASBESTOS PROJECT
Contaminant Screening Study
Primary Structure and Property Assessment Information Field Form

Field Logbook No.: _____ Page No.: _____ Site Visit Date: _____
 Address: _____ Structure Description: _____
 Occupant: _____ Phone Number: _____
 Owner (if different than occupant): _____ Phone Number: _____
 Sampling Team: _____
 Field Form Check Completed by (100% of forms): _____
 Screening Field Check Completed by (2% of forms): _____

Data Item	Value	Notes
HOUSE ATTRIBUTES		
Property Description	Residential Industrial Commercial	
Surrounding Land Use	Residential Industrial Commercial School Mining Other: _____	
Year of Construction	_____ Unknown	
Square Footage		
Construction Material	Wood frame Masonry/Stone Other: _____	
Number of Floors Above Ground	1 2 3 Other: _____	
Number of Rooms Per Floor Above Ground	1: _____ 2: _____ 3: _____ Other: _____	
Basement	Yes No	
Heating Source	Wood/Coal Electric Propane/Gas Other: _____	
Heat Distribution	Forced air Radiant Other: _____	

CSS INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

Data Item	Value	Notes
OCCUPANT INFORMATION		
Number of Adults/Employees	0 1 2 3 4 5-15 16-20 21-30 >30	
Number of Children	0 1 2 3 4 Other: _____	
Years at Location	<1 1-5 5-10 10-15 >15	
Was the residence/building remodeled?	Yes No If yes, When (years): <2 2-5 >5 Where: Attic Living Areas Garage Basement Other: _____	
Has resident/business purchased any Libby vermiculite materials from W.R. Grace in the past?	Yes No	
Has the property at this location been used for a for-profit enterprise of distributing, treating, storing, or disposing of Libby vermiculite?	Yes No	
Are there any known areas of exposed vermiculite?	Yes No If yes, Where: Ceiling Walls Floors Attic Other: _____	

CSS INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

Data Item	Value	Notes
INDOOR ASSESSMENT		
Vermiculite Insulation Past or Present	Attic: Yes No NA Unknown Walls: Yes No NA Unknown Basement: Yes No NA Unknown Crawl Space: Yes No NA Unknown Other: _____	Visual confirmation of current presence or absence required for attic.
Evidence of Physical Damage?	Yes No	
Evidence of Water Damage?	Yes No	
OUTDOOR ASSESSMENT		
Libby Amphibole Sources Present	Garden: Yes No NA Yard: Yes No NA Stockpiles: Yes No NA Other: _____	
Proximity to Other Properties with Potential Sources of Libby Amphiboles	Next door Within same block Other: _____ Unknown	

CSS INFORMATION FIELD FORM (continued)

Address: _____

BD# _____

Data Item	Value	Notes
EXPOSURE ASSESSMENT		
Type and Frequency of Activity Near Vermiculite Material - Indoor	Frequency:	Once a day Once a week Once a month Once a year Not Applicable
	Duration of Contact:	<1 hour 1-2 hours 2-4 hours >4 hours Not Applicable
	Extent of Contact:	Heavy Moderate Light Not Applicable
Type and Frequency of Activity Near Vermiculite Material - Outdoor	Frequency:	Once a day Once a week Once a month Once a year Not Applicable
	Duration of Contact:	<1 hour 1-2 hours 2-4 hours >4 hours Not Applicable
	Extent of Contact:	Heavy Moderate Light Not Applicable

• **CSS INFORMATION FIELD FORM (continued)**

Address: _____

BD# _____

Data Item	Value	Notes
CONTAMINANT SCREENING STUDY ASSESSMENT		
Occupant Information		
Is there any knowledge of former miners, close relative of miners, or any highly exposed persons living or visiting the property?	Yes No Unknown	
Is the resident, past or present, diagnosed with an asbestos related disease?	Yes No Unknown	
Indoor Information		
Does the interior have Zonolite attic insulation?	Yes No Unknown	
Did the interior ever have Zonolite attic insulation?	Yes No Unknown NA	NA applies if attic currently has ZAI.
Are there vermiculite additives in any of the building materials?	Yes No Unknown	
Outdoor Information		
Is there any evidence of primary source materials at or near the property?	Yes No Unknown	
Could this have been tracked indoors or otherwise spread outdoors on the property?	Yes No Unknown	
Overall Assessment		
Are primary source materials present at the property?	Yes No	
Where are primary source materials located?	Inside Outside Both NA	
ADDITIONAL INFORMATION _____		

. CSS INFORMATION FIELD FORM (continued)

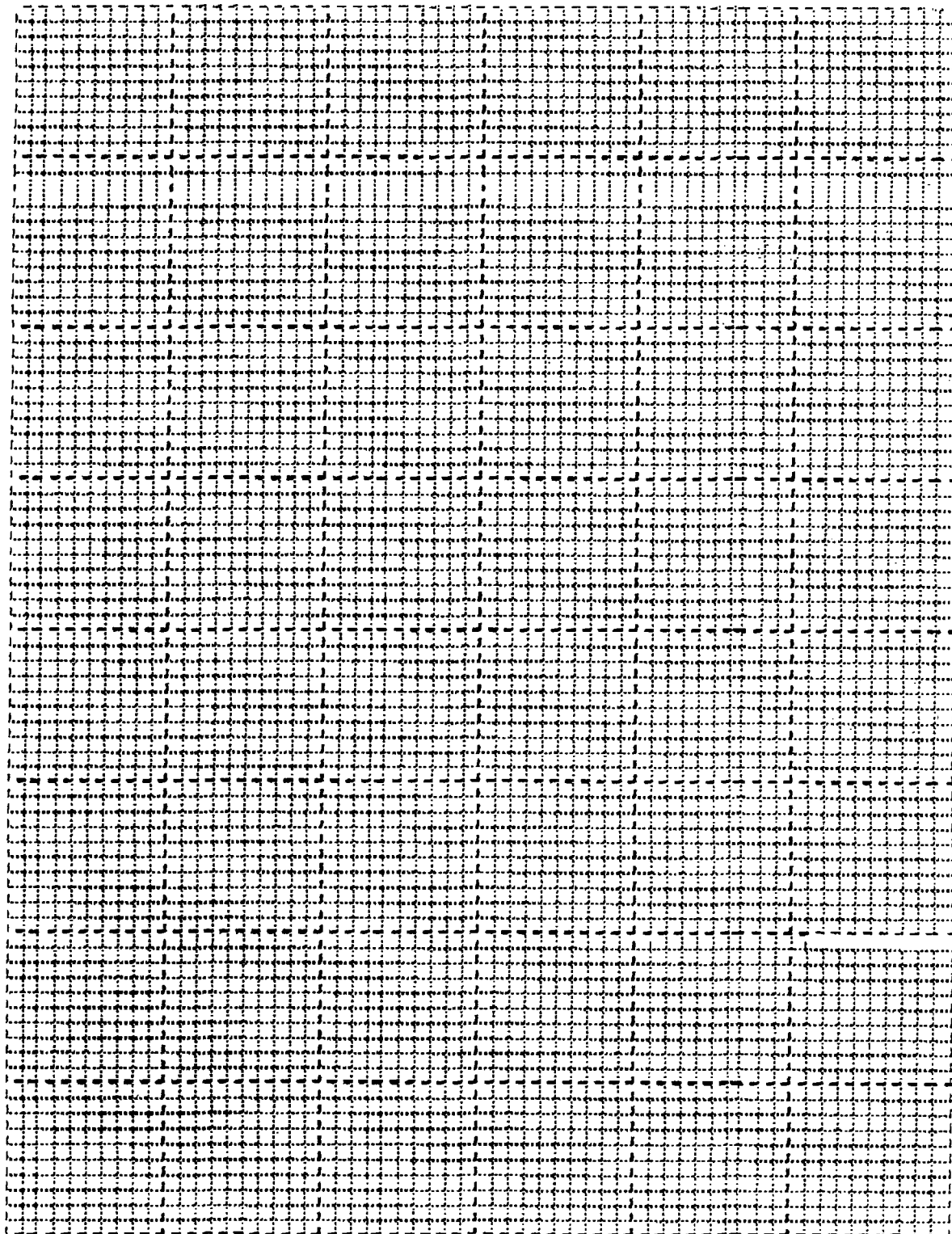
Address: _____

BD# _____

FIELD DIAGRAM OF PROPERTY

Identify important features (i.e. drainage, trees, gardens, structures, flowerbeds, utility poles, known underground utilities, suspected Libby amphibole source areas, sample locations, etc).

NOT TO SCALE



• CSS INFORMATION FIELD FORM (continued)

Address: _____

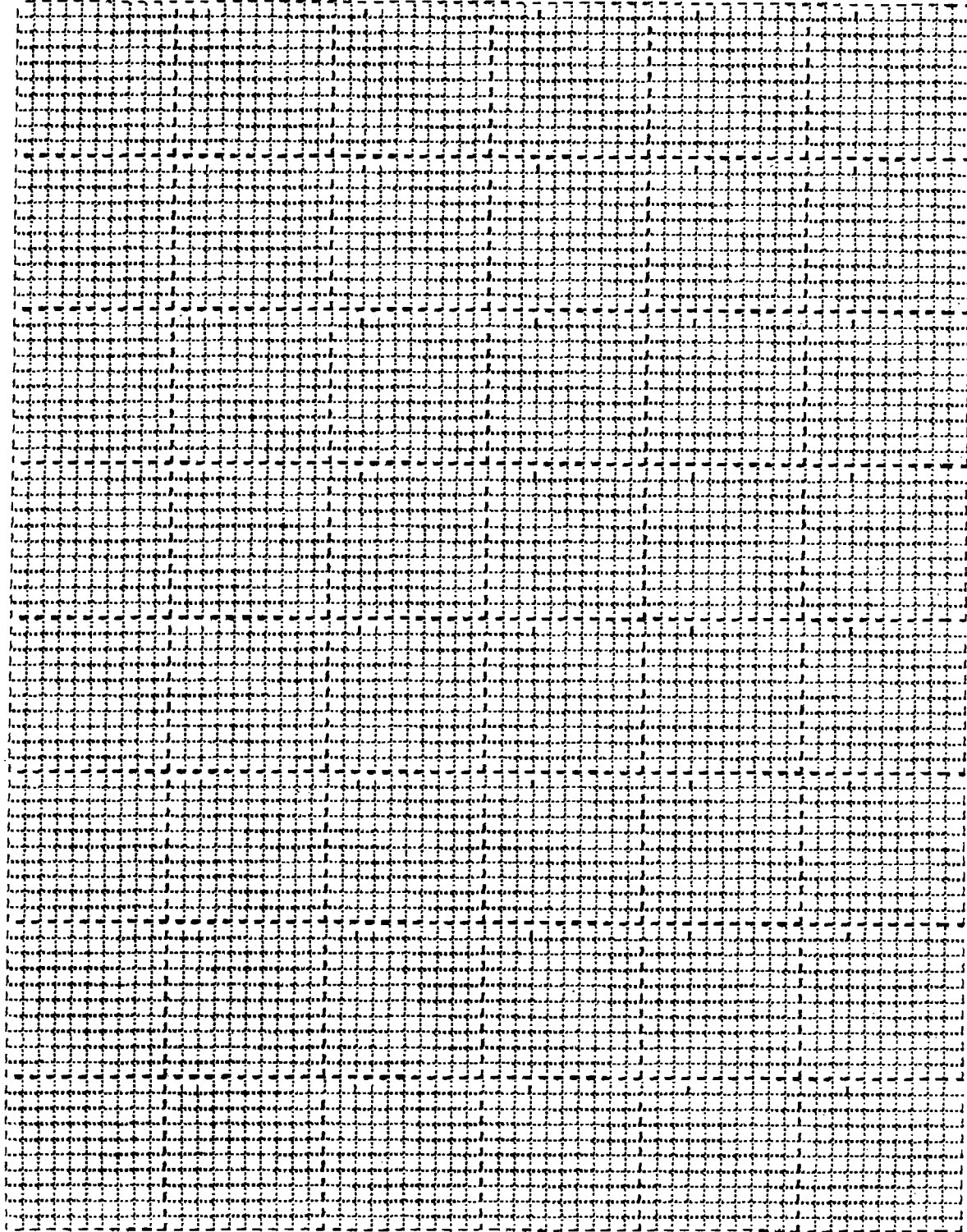
BD# _____

FIELD DIAGRAM OF PRIMARY STRUCTURE

Floor of House (circle): First Second Third Basement

Include approximate dimensions of rooms and floor covering type. Use more than one diagram if needed. Completed only if ZAI is present.

Scale: 1/10" = 1 foot



110

Location Libby, MT Date 6/29/02Project / Client Libby Asbestos SiteVolpe Center EPA Region 811 1545 Prepare Modification Form 000042:11 Version 3 of Primary Information Field Form.a Following changes were made to the Form11 ① Number of Adults/Employees: ① is added11 as an option to use when properties are11 vacant. ^{① 6-29-02} ②11 ② Vermiculite ~~Insulation~~ Insulation Past or Present11 Portion of the Indoor Assessment: Unknown11 Added as an option to ^{① 6-29-02} all categories to11 use when ^{① 6-29-02} issue ~~can be~~ question can not be11 Answered. ②11 ③ Exposure Assessment: Not Applicable11 Added to all categories as an option. To be11 used when vermiculite is not present at the11 property. ②b ④ Did the interior ever have Zonolite attic11 insulation? : Question answer NA provided11 to be used if attic currently has ZALc ⑤ Question "Is there evidence of primary11 source materials near the property?" changed to11 "Is there any evidence of primary source11 materials at or near the property?"